

U.S. Department of Justice

Washington, DC 20530

Received By NSD/FARA Registration Unit 12/10/2019 1:19:00 PM

Amendment to Registration Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration No.
Rasky Partners	6586

3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☐ To give a 10-day notice of change in information as required by Section 2(b) of the Act.
- ☒ To correct a deficiency in
- ☐ Initial Statement
- ☒ Supplemental Statement for the period ending 9/30/19
- ☐ Other purpose (*specify*) _____
- ☐ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:

Exhibit B to Registration.

Attachment to Supplemental Statement for period ending 9/30/19

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. (*If space is insufficient, a full insert page must be used.*)

Although Registrant has terminated its registration with the FARA Unit, an amendment to Exhibit B is filed to clarify answers to questions 7, 8, and 9 (which was previously disclosed in the attachment to Exhibit B) and an amendment to Supplemental Statement Attachment for period ending 9/30/19 is filed to provide more general information to question 11.

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FORM NSD-5
Revised 05/17

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹)

December 09, 2019

/s/ Lawrence Rasky

eSigned

¹ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

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Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant	2. Registration No.
Rasky Partners	6586

3. Name of Foreign Principal
Embassy of the Republic of Azerbaijan

Check Appropriate Box:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.
- Strategic communications and public relations services.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Strategic communications and public relations services.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Strategic communications and public relations services.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit B	Name and Title	Signature
December 09, 2019	Lawrence Rasky, CEO	/s/ Lawrence Rasky eSigned

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

ATTACHMENT

I - REGISTRANT

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month period? Yes

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Dana Doran	Employee	Embassy of the Republic of Azerbaijan	8/27/19
William Monroe	Consultant	Embassy of the Republic of Azerbaijan	8/27/19
Anne Tyrrell	Employee	Embassy of the Republic of Azerbaijan	8/27/19
Alexandra Wich	Employee	Embassy of the Republic of Azerbaijan	8/27/19
Larry Rasky	Partner	Embassy of the Republic of Azerbaijan	8/27/19

III – ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes.

If yes, identify each foreign principal and describe in full detail your activities and services: Registrant engaged in strategic communications counsel and public relations services for the Embassy of the Republic of Azerbaijan (also see answer to Question 12 below).

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below? Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

If yes, identify each foreign principal and describe in full detail your activities and services:

Rasky Contact	Name	Outlet/Organization	Date (Range)	Method	Notes/Reason for contact
Alexandra Wich	Kristen Cheriegate	Caspian Policy Center	5/14/2019	Email	Request for media RSVPs for Trans-Caspian Forum
Anne Tyrrell	Natavan Mammadova	American Chamber of Commerce in Azerbaijan	5/23/2019	In-person and follow-up email	Coordination for potential op-ed piece
Anne Tyrrell	Johnny Harris	Vox	5/31/2019	In-person/email	Introductory conversation
William K. Monroe	Casey Michel	Think Progress	6/3/2019 -- 6/11/19	Email	Response to questions
William K. Monroe	Joel Gehrke	Washington Examiner	6/4/2019 -- 6/11/19	Email	Interview request
William K. Monroe	Tom Howell	Washington Times	6/4/2019 -- 6/11/19	Email	Interview request
William K. Monroe	Uri Friedman	The Atlantic	6/4/2019 -- 6/11/19	Email	Interview request
William K. Monroe	Ethan Barton	The Daily Caller	6/4/2019 -- 6/11/19	Email	Interview request
Anne Tyrrell	Christopher Bedford	The Daily Caller News Foundation	6/7/2019	Email	Event invitation and interview request
Anne Tyrrell	Geoffrey Ingersoll	The Daily Caller	6/7/2019	Email	Event invitation and interview request
William K. Monroe	Mary Bird	Georgetowner	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request

William K. Monroe	Michael Rubin	American Enterprise Institute	6/10/2019	Email	Interview request
William K. Monroe	Peter Beinart	The Atlantic	6/10/2019	Email	Interview request
William K. Monroe	Dan Boylan	Washington Times	6/10/2019	Email	Interview request
William K. Monroe	Caitlin Frazier	The Atlantic	6/10/2019	Email	Interview request
William K. Monroe	Uri Friedman	The Atlantic	6/10/2019	Email	Interview request
William K. Monroe	Joel Gehrke	Washington Examiner	6/10/2019	Email	Interview request
William K. Monroe	Robbie Gramer	Foreign Policy	6/10/2019	Email	Interview request
William K. Monroe	Peter Grier	Christian Science Monitor	6/10/2019	Email	Interview request
William K. Monroe	Michael Hirsh	Foreign Policy	6/10/2019	Email	Interview request
William K. Monroe	Howard LaFranchi	Christian Science Monitor	6/10/2019	Email	Interview request
William K. Monroe	Caroline Lalonde	World Affairs Journal	6/10/2019	Email	Interview request
William K. Monroe	Clifford May	Washington Times	6/10/2019	Email	Interview request
William K. Monroe	Robert Merry	The American Conservative	6/10/2019	Email	Interview request
William K. Monroe	Jackie Northam	NPR	6/10/2019	Email	Interview request
William K. Monroe	Susan Milligan	US News & World Report	6/10/2019	Email	Interview request
William K. Monroe	Will Racke	The Daily Caller	6/10/2019	Email	Interview request

William K. Monroe	John Arundel	Washington Life	6/7/2019 -- 6/11/2019	Email/phone call	Event invitation and interview request
William K. Monroe	Robert Devaney	Georgetown	6/7/2019 -- 6/11/2019	Email/phone call	Event invitation and interview request
William K. Monroe	Emily Heil	Washington Post	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Ken Shepherd	Washington Times	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Greg Nash	The Hill	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Katie Ellsworth	Politico	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Tom Williams	Roll Call	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Steve Kiviat	Washington City Paper	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Gary Tischler	Georgetown	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Larry Luxner	Washington Diplomat	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	John Aaron	WTOP	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Carl Willis	WJLA	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Jeff Hager	WMAR	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Kristen Hinman	Washingtonian	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Lauren Lauder milk	DC Modern Luxury	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request
William K. Monroe	Janet Donovan	Washington Life	6/7/2019 -- 6/11/2019	Email/phone call	Event invitation and interview request
William K. Monroe	Ela Sathern	Capitol File	6/7/2019 -- 6/11/2019	Email	Event invitation and interview request

William K. Monroe	Warren Strobel	Reuters	6/10/2019	Email	Interview request
William K. Monroe	Jonathan Tepperman	Foreign Policy	6/10/2019	Email	Interview request
William K. Monroe	Nick Wadhams	Bloomberg News	6/10/2019	Email	Interview request
William K. Monroe	John Walcott	Reuters	6/10/2019	Email	Interview request
William K. Monroe	Sarah Wildman	Foreign Policy	6/10/2019	Email	Interview request
William K. Monroe	Lesley Wroughton	Reuters	6/10/2019	Email	Interview request
William K. Monroe	John Jessup	Christian Broadcasting News	6/10/2019	Email	Interview request
William K. Monroe	Ben Kennedy	Christian Broadcasting News	6/10/2019	Email	Interview request
William K. Monroe	Dana Ritter	Christian Broadcasting News	6/10/2019	Email	Interview request
William K. Monroe	Paul Strand	Christian Broadcasting News	6/10/2019	Email	Interview request
William K. Monroe	Christopher Begg	Old Testament Abstracts	6/10/2019	Email	Interview request
William K. Monroe	Dan Byrd	Blog from the Capital	6/10/2019	Email	Interview request
William K. Monroe	Joey Corbett	Biblical Review	6/10/2019	Email	Interview request
William K. Monroe	Joseph Mangina	Pro Ecclesia	6/10/2019	Email	Interview request
William K. Monroe	Robert trisco	Catholic Review	6/10/2019	Email	Interview request
William K. Monroe	Michael Wilner	Jerusalem Post	6/10/2019	Email	Interview request
Larry Rasky	Betsy Dudley	Congressman Steve Cohen	6/27/2019 -- 6/28/2019	Email	Coordination for potential op-ed piece

Larry Rasky	Betsy Dudley	Congressman Steve Cohen	7/16/2019	Email	Coordination for potential op-ed piece
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IV. – FINANCIAL INFORMATION

15(c) DISBURSEMENTS – POLITICAL CONTRIBUTIONS

During this 6 month period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes.

If yes, furnish the following information:

Political Donations - Past 6 Months

State

Larry Rasky	4/15/2019	Bok, Mackenzie	\$200
Larry Rasky	5/29/2019	Walsh, Martin	\$200
Larry Rasky	5/30/2019	Wu, Michelle	\$200
Larry Rasky	6/27/2019	Claire, Cronin	\$200
Larry Rasky	7/1/2019	Liang, Nina	\$200
Larry Rasky	9/30/2019	Healey, Maura	\$200
Larry Rasky	10/7/2019	Flaherty, Michael	\$200

National

Larry Rasky	4/15/2019	American Possibilities	\$1,000.00
Larry Rasky	5/3/2019	Reed, Jack	\$1,000
Larry Rasky	5/20/2019	Peters, Gary	\$2,800
Larry Rasky	5/21/2019	Mass. Dem. State Cemetary	\$2,500
Larry Rasky	5/22/2019	Deutch, Ted	\$1,000
Larry Rasky	5/29/2019	New Pioneers PAC	\$1,000
Larry Rasky	6/3/2019	Cicilline, David	\$1,000
Larry Rasky	6/3/2019	Coons, Chris	\$1,000

Larry Rasky	6/6/2019	Shaheen, Jeanne	\$800
Larry Rasky	6/11/2019	Neal, Richard	\$2,800
Larry Rasky	6/13/2019	Baer, Dan	\$1,000
Larry Rasky	6/23/2019	Pappas, Chris	\$2,800
Larry Rasky	6/26/2019	Lynch, Stephen	\$1,000
Larry Rasky	6/30/2019	Trahan, Lori	\$1,000
Larry Rasky	9/13/2019	Espaillet, Adriano	\$2,800
Larry Rasky	9/25/2019	Reed, Jack	\$1,000
Larry Rasky	9/29/2019	Slotkin, Elissa	\$1,000
Larry Rasky	9/29/2019	Malinowski, Tom	\$2,800
Larry Rasky	10/23/2019	Kelly, Mark	\$2,800